

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

K.C., *et al.*,

Plaintiffs,

v.

No. 1:23-cv-00595-JPH-KMB

THE INDIVIDUAL MEMBERS OF THE
MEDICAL LICENSING BOARD OF
INDIANA, in their official capacities, *et al.*,

Defendants.

Declaration of Michael Rabinowitch and Lindsey Rabinowitch

Come now Michael and Lindsey Rabinowitch, being duly sworn upon their oaths,
and say that:

1. We are adult residents of Marion County, Indiana and are married to each other.
2. We have a 15-year-old daughter.
3. Although our daughter's birth-assigned sex was male, she has identified as female for some time.
4. She receives care through the Gender Health Program at Riley Hospital and has since January of 2022.
5. She has been diagnosed as suffering from gender dysphoria. This has led her in the past to be extremely depressed and anxious.
6. She receives mental health counseling because of her gender dysphoria.

7. Beginning in May of 2022 she was prescribed and began to receive a puberty blocker.

8. Beginning in May/June of 2022 she began to receive estradiol, a feminizing hormone, and she continues to receive the hormone.

9. The gender-affirming treatment that she has received through the puberty blocker and then the hormone has greatly improved her mental health. She is much happier now, is more confident and outgoing, and has developed friendships.

10. We agreed to the puberty blocker and feminizing hormone for our daughter only after being fully informed by medical personnel of their benefits and potential negative effects.

11. We strongly believe that we, in consultation with our daughter and her doctors, have the right to make medical decisions for our daughter. This is not an area into which the State of Indiana has any right to intrude.

12. However, we recognize that if S.E.A. 480 goes into effect our daughter will eventually be denied the ability to receive the gender-affirming hormone. This will cause her to develop male physical characteristics that will be permanent. This will be profoundly damaging to her and will cause injuries that will not be able to be repaired. It will be terrible for her.

13. Our daughter will turn 16 during summer of 2023, which means that now arbitrarily the state of Indiana has chosen to take away potentially life-saving treatment, administered

under the diagnosis, care, and treatment by licensed medical professionals, for a two year period until she turns 18.

Verification

We verify under penalty of perjury that the foregoing is true and correct.

Executed on: Apr. 17, 2023


Michael Rabinowitch


Lindsey Rabinowitch

Prepared by:

Kenneth J. Falk
ACLU of Indiana